

VZCZCXRO4865
RR RUEHCN RUEHGH RUEHVC
DE RUEHHK #0599/01 0900943
ZNR UUUUU ZZH EP EXS OLA PA
R 310943Z MAR 09
FM AMCONSUL HONG KONG
TO RUEHC/SECSTATE WASHDC 7291
INFO RUEHOO/CHINA POSTS COLLECTIVE
RUEAEP/HQ EPA WASHDC

UNCLAS SECTION 01 OF 02 HONG KONG 000599

SENSITIVE
SIPDIS

E.O. 12958: N/A
TAGS: [SFPV](#) [TPHY](#) [HK](#) [CH](#)
SUBJECT: HONG KONG AIMS LOW ON AIR QUALITY STANDARDS

¶1. (U) SUMMARY: The Hong Kong Government has proposed the adoption of World Health Organization (WHO) Tier 1 Interim Target Air Quality Standards for three of four major pollutant categories. The full adoption of WHO Air Quality Goals is a long-term objective. Hong Kong NGOs and civic groups are crying foul at the recommendations, claiming the proposed WHO Tier 1 Standards are designed for developing countries that lack resources or capabilities, do not consider the full impact of pollution on public health, and are inappropriate for Hong Kong.

¶2. (SBU) COMMENT: The NGOs make a good point. Current Hong Kong air pollution levels for sulphur dioxide, one of the categories proposed for WHO Tier 1 adoption, are already well under the limit set by the WHO Tier 1 Standard and very close to meeting the WHO Air Quality Goal (AQG); it would be relatively easy to meet the AQG with expected improvements from already programmed projects. The HKG-sponsored study backing the standards claims to be driven by public health concerns but contains no health impact data or analysis, instead focusing on economic analysis explaining why stricter standards are too painful to adopt. NGOs privately speculate that the low standards proposed by the HKG anticipate future overall air pollution increases resulting from major infrastructure projects like the Hong Kong/Zhuhai Bridge. Early studies suggest that, once complete, this bridge alone could bring an additional 10,000 mainland Chinese trucks to Hong Kong's shipping terminals daily, introducing a significant new stream of air pollution into the city. END COMMENT.

Adoption of WHO Air Quality Standards

¶3. (U) On March 20, the HKG Environmental Protection Department (EPD) formally released the results of an 18-month review of Hong Kong's Air Quality Objectives (AQO) and proposed a plan for the development of a long-term air quality strategy for Hong Kong. (Hong Kong's current AQO's have not been reviewed or modified since 1987.) Advance copies of the study, completed by a private consultancy group, were provided to the Legislative Council (LegCo) on March 19. The public eagerly anticipated the release; an EPD-organized press conference drew a crowd of approximately 450 people. The plan's release begins a one-month public consultation period during which the recommendations can be modified before they are formally adopted as Hong Kong's new Air Quality Standards.

¶4. (U) Hong Kong plans to replace its current 1987 standards by adopting WHO AQOs, but generally at Interim Target (IT) levels. These ITs were designed in three tiers by the WHO as stepping stones to assist countries reach the a final WHO Air Quality Goals (AQG) deemed as the minimum standards necessary by the WHO to protect public health. Under the plan, Hong Kong will adopt WHO ITs or AQGs for the following pollutants:

- Sulphur Dioxide) IT-1 (125 Micrograms per Cubic Meter per 24 hrs)
- Respirable Suspended Particulates (PM10)) IT-2 (100 Micrograms per Cubic Meter per 24 hrs)
- Fine Respirable Suspended Particulates (PM2.5)) IT-1 (75

Micrograms per Cubic Meter per 24 hrs)

- Nitrogen Dioxide) WHO AQG (200 Micrograms per Cubic Meter per 1 hr)
- Ozone) IT-1 (160 Micrograms per Cubic Meter per 8 hrs)
- Carbon Monoxide) WHO AQG (30,000 Micrograms per Cubic Meter per 1 hr)
- Lead) WHO AQG (.5 Micrograms per Cubic Meter per 1 yr)

(NOTE: Hong Kong's air quality is already within the WHO AQG for both carbon monoxide and lead and very close to the AQG of 20 micrograms per cubic meter per 24 hrs for sulphur dioxide, on most days measuring at 22. There are no WHO ITs for nitrogen dioxide. END NOTE.)

15. (U) To achieve these new AQOs, the study recommended 36 steps or actions which could be taken to reduce emissions and provided a cost-benefit analysis on each of these to determine the financial impact if accepted. Specific recommendations ranged from increasing the use of natural gas in local electricity generation to 50% (already a stated goal), to the mandatory implementation of building energy codes, to a 25% reduction of parking spaces in Hong Kong's Central Business District to discourage commuters from driving into the city. The study also recommends that the full adoption of WHO AQGs be pursued as Hong Kong's stated long-term aspirational goal while taking progressive steps to tighten adopted AQOs. The study did not make a firm recommendation on the interval between AQO reviews, but noted that about every five years was the normal international practice.

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The NGO and Civic Organization Response

16. (SBU) NGOs and civic organization reacted to the study politely but are clearly disappointed. Many of those present had pushed hard for the adoption of WHO AQOs and expressed frustration at the recommendation to adopt the lowest possible or T-1 Standards. Questioners pointed out that Hong Kong's air quality already significantly exceeds the entry level standards for some pollutants and, despite the claim that public health was the key parameter for determining the new AQOs, health was not mentioned in the text and did not appear to be a factor in the analysis. In response to these criticisms, EPD representatives said the raw data and underlying assumptions used by the consultation firm in their analysis would be made available to the public. Public input and comments will be solicited through the end of April. Final AQOs will be submitted to LegCo for review in May and are expected to be implemented by the end of 2009.

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